

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No: 18-20255

Honorable: Victoria A. Roberts

v.

D-3 James Warner,

Defendant.

FORFEITURE BILL OF PARTICULARS

The United States of America, by and through its counsel, Matthew Schneider, United States Attorney and Paul A. Kuebler, Assistant United States Attorney, submits this Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure. The United States submits this Forfeiture Bill of Particulars to supplement the criminal forfeiture allegations included in the Second Superseding Indictment and to list specific property that the United States intends to forfeit upon Defendant's conviction. (Dkt. #7.)

This Forfeiture Bill of Particulars incorporates by reference, in its entirety, the Second Superseding Indictment, specifically the Forfeiture Allegation. Property subject to forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(c) with 28 U.S.C. § 2461(c), includes, but is not limited to:

1. \$468,830.65 in funds from account number: 3883329305 in the name of JBL Property LLC at TCF National Bank, Plymouth, MN;
2. \$2,028,136.38 in frozen funds from account number: 638-241262 in the name of James R. Warner at Fidelity Investments, Covington, KY;
3. \$806,013.65 in frozen funds from account number: 159-930270 in the name of James R. Warner at Fidelity Investments, Covington, KY;
4. \$326,980.51 in frozen funds from account number: X26-993360 in the name of James R. Warner at Fidelity Investments, Covington, KY;
5. \$301,278.38 in frozen funds from account number: X26-993379 in the name of James R. Warner at Fidelity Investments, Covington, KY.

This Forfeiture Bill of Particulars does not limit the United States from seeking the forfeiture of additional property.

Respectfully submitted,

MATTHEW SCHNEIDER
United States Attorney

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Dated: May 25, 2018

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2018, the foregoing document was electronically filed with the Clerk of the Court using the ECF system which will send notification to all ECF participants.

S/Paul A. Kuebler
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